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12 – and –

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24 Attorneys for Plaintiff/Counter-Defendant
25 BARTECH SYSTEMS INTERNATIONAL, INC.

26 UNITED STATES DISTRICT COURT
27 DISTRICT OF NEVADA

28 BARTECH SYSTEMS INTERNATIONAL,
INC., a Delaware corporation,

Plaintiff/Counter-defendant,

vs.

MOBILE SIMPLE SOLUTIONS, INC., a
Delaware corporation, MOBILE SIMPLE
SOLUTIONS (IAS), INC., a Canadian
corporation, VINCENT TESSIER, an
individual, CHRISTELLE PIGEAT, an
individual,

Defendants/Counterclaimants.

Case No. 2:15-cv-02422-MMD-NJK

~~PROPOSED~~ ORDER

1 **UPON CONSIDERATION** of the pleadings, Plaintiff and Counter-Defendant Bartech
2 Systems International's ("Bartech") Second Motion for Contempt (ECF No. 117, sealed
3 unredacted ECF No. 121) and the errata thereto (ECF No. 132), the Response filed by Defendants
4 and Counterclaimants Mobile Simple Solutions, Inc., Mobile Simple Solutions (IAS), Inc.,
5 Vincent Tessier, and Christelle Pigeat ("Defendants") (ECF No. 128), the Reply filed by Bartech
6 (ECF No. 135), and for the reasons stated on the record during the March 23, 2017 hearing and
7 the minutes (ECF No. 254) and transcript of that hearing, it is hereby **ORDERED** that
8 Defendants shall:
9

10 (1) Immediately cease selling, leasing, renting, or offering for sale, lease, rent or
11 subscription any version of the ABreez software that contains any version of the PMS
12 application without leave of Court. Leave of Court shall not be granted except in the
13 following circumstances: an independent expert in the fields of computer science and
14 computer forensics, at Defendants' expense, shall file a status report with the
15 independent expert's certification that Defendants' software no longer contains
16 Bartech's source code or other misappropriated trade secrets.
17

18 (2) Provide notice via electronic and regular mail in the form of **Exhibit A** to this Order to
19 all customers of ABreez not using the ABreez software as a "stand alone" solution that
20 notifies such customers (identified in **Exhibit B**) that this Court's May 24, 2016 Order
21 (ECF No. 96) prohibits Defendants from selling, leasing, renting, or offering for sale,
22 lease, rent, or subscription any version of the ABreez software that contains any
23 version of the PMS application, and that any further use of the ABreez software is
24 prohibited without further Order of this Court.
25

26 (3) File proofs of service to show that the notice in the form of **Exhibit A** was provided to
27 the customers identified in **Exhibit B**.
28

1 **IT IS FURTHER ORDERED** that:

- 2 (1) If Defendants fail to file proofs of service of the notice in the form of **Exhibit A** to the
3 customers identified in **Exhibit B** within five (5) days of the date of this Order, then
4 Bartech may provide the notice.
5
6 (2) Bartech is awarded reasonable attorneys' fees incurred in briefing and arguing the
7 Second Motion for Contempt.

8 **IT IS SO ORDERED.**

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10
11
12 DATED: April 6, 2017



UNITED STATES DISTRICT JUDGE

EXHIBIT A

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Holiday Inn Vilnius (the "Hotel") cannot use the ABreez
16 software until further notice. Therefore, please take whatever steps are necessary to disable the
17 ABreez software on the Hotel's network system, including uninstalling the ABreez software if
18 necessary. This directive is the result of a court order issued by the United States District Court
19 for the District of Nevada. The court found that the ABreez Property Management System
20 Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
22 **further order of the court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,

6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Beekman Hotel (the "Hotel") cannot use the ABreez
16 software until further notice. Therefore, please take whatever steps are necessary to disable the
17 ABreez software on the Hotel's network system, including uninstalling the ABreez software if
18 necessary. This directive is the result of a court order issued by the United States District Court
19 for the District of Nevada. The court found that the ABreez Property Management System
20 Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
22 **further order of the court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Royalton Hotel (the "Hotel") cannot use the ABreez
16 software until further notice. Therefore, please take whatever steps are necessary to disable the
17 ABreez software on the Hotel's network system, including uninstalling the ABreez software if
18 necessary. This directive is the result of a court order issued by the United States District Court
19 for the District of Nevada. The court found that the ABreez Property Management System
20 Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
further order of the court.

22 The court ordered that this notice be sent to all customers using the ABreez software with
23 the Property Management System Application installed.
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BARTECH SYSTEMS INTERNATIONAL,
INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

Plaintiff/Counter-defendant,
vs.

MOBILE SIMPLE SOLUTIONS, INC., a
Delaware corporation, MOBILE SIMPLE
SOLUTIONS (IAS), INC., a Canadian
corporation, VINCENT TESSIER, an
individual, CHRISTELLE PIGEAT, an
individual,

Defendants/Counterclaimants.

NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE

You are hereby notified that the Wythe Hotel (the "Hotel") cannot use the ABreez software until further notice. Therefore, please take whatever steps are necessary to disable the ABreez software on the Hotel's network system, including uninstalling the ABreez software if necessary. This directive is the result of a court order issued by the United States District Court for the District of Nevada. The court found that the ABreez Property Management System Application was developed using trade secrets misappropriated from Bartech Systems International, Inc. **Therefore, further use of the ABreez software is prohibited without further order of the court.**

The court ordered that this notice be sent to all customers using the ABreez software with the Property Management System Application installed.

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Nativ Hotel (the "Hotel") cannot use the ABreez software
16 until further notice. Therefore, please take whatever steps are necessary to disable the ABreez
17 software on the Hotel's network system, including uninstalling the ABreez software if necessary.
18 This directive is the result of a court order issued by the United States District Court for the
19 District of Nevada. The court found that the ABreez Property Management System Application
20 was developed using trade secrets misappropriated from Bartech Systems International, Inc.

21 **Therefore, further use of the ABreez software is prohibited without further order of the**
22 **court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Clift Hotel (the "Hotel") cannot use the ABreez software
16 until further notice. Therefore, please take whatever steps are necessary to disable the ABreez
17 software on the Hotel's network system, including uninstalling the ABreez software if necessary.
18 This directive is the result of a court order issued by the United States District Court for the
19 District of Nevada. The court found that the ABreez Property Management System Application
20 was developed using trade secrets misappropriated from Bartech Systems International, Inc.

21 **Therefore, further use of the ABreez software is prohibited without further order of the**
22 **court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 BARTECH SYSTEMS INTERNATIONAL,
INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
Delaware corporation, MOBILE SIMPLE
8 SOLUTIONS (IAS), INC., a Canadian
corporation, VINCENT TESSIER, an
9 individual, CHRISTELLE PIGEAT, an
individual,

10 Defendants/Counterclaimants.
11

12 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

13 You are hereby notified that The Raphael Hotel (the "Hotel") cannot use the ABreez
14 software until further notice. Therefore, please take whatever steps are necessary to disable the
15 ABreez software on the Hotel's network system, including uninstalling the ABreez software if
16 necessary. This directive is the result of a court order issued by the United States District Court
17 for the District of Nevada. The court found that the ABreez Property Management System
18 Application was developed using trade secrets misappropriated from Bartech Systems
19 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
20 **further order of the court.**
21

22 The court ordered that this notice be sent to all customers using the ABreez software with
23 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Peninsula Beverly Hills Hotel (the "Hotel") cannot use
16 the ABreez software until further notice. Therefore, please take whatever steps are necessary to
17 disable the ABreez software on the Hotel's network system, including uninstalling the ABreez
18 software if necessary. This directive is the result of a court order issued by the United States
19 District Court for the District of Nevada. The court found that the ABreez Property Management
20 System Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
22 **further order of the court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that The Quin Hotel (the "Hotel") cannot use the ABreez software
16 until further notice. Therefore, please take whatever steps are necessary to disable the ABreez
17 software on the Hotel's network system, including uninstalling the ABreez software if necessary.
18 This directive is the result of a court order issued by the United States District Court for the
19 District of Nevada. The court found that the ABreez Property Management System Application
20 was developed using trade secrets misappropriated from Bartech Systems International, Inc.

21 **Therefore, further use of the ABreez software is prohibited without further order of the**
22 **court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Renaissance Paris Republique (the "Hotel") cannot use
16 the ABreez software until further notice. Therefore, please take whatever steps are necessary to
17 disable the ABreez software on the Hotel's network system, including uninstalling the ABreez
18 software if necessary. This directive is the result of a court order issued by the United States
19 District Court for the District of Nevada. The court found that the ABreez Property Management
20 System Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without
further order of the court.**

22 The court ordered that this notice be sent to all customers using the ABreez software with
23 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that the Mondrian Hotel (the "Hotel") cannot use the ABreez
16 software until further notice. Therefore, please take whatever steps are necessary to disable the
17 ABreez software on the Hotel's network system, including uninstalling the ABreez software if
18 necessary. This directive is the result of a court order issued by the United States District Court
19 for the District of Nevada. The court found that the ABreez Property Management System
20 Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
22 **further order of the court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,

6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
10 corporation, VINCENT TESSIER, an
11 individual, CHRISTELLE PIGEAT, an
12 individual,

13 Defendants/Counterclaimants.

14 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

15 You are hereby notified that The Dorchester Hotel (the "Hotel") cannot use the ABreez
16 software until further notice. Therefore, please take whatever steps are necessary to disable the
17 ABreez software on the Hotel's network system, including uninstalling the ABreez software if
18 necessary. This directive is the result of a court order issued by the United States District Court
19 for the District of Nevada. The court found that the ABreez Property Management System
20 Application was developed using trade secrets misappropriated from Bartech Systems
21 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
22 **further order of the court.**

23 The court ordered that this notice be sent to all customers using the ABreez software with
24 the Property Management System Application installed.
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 BARTECH SYSTEMS INTERNATIONAL,
4 INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

5 Plaintiff/Counter-defendant,
6 vs.

7 MOBILE SIMPLE SOLUTIONS, INC., a
8 Delaware corporation, MOBILE SIMPLE
9 SOLUTIONS (IAS), INC., a Canadian
individual, VINCENT TESSIER, an
individual, CHRISTELLE PIGEAT, an
individual,

10 Defendants/Counterclaimants.
11

12 **NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE**

13 You are hereby notified that the Trump Vancouver Hotel (the "Hotel") cannot use the
14 ABreez software until further notice. Therefore, please take whatever steps are necessary to
15 disable the ABreez software on the Hotel's network system, including uninstalling the ABreez
16 software if necessary. This directive is the result of a court order issued by the United States
17 District Court for the District of Nevada. The court found that the ABreez Property Management
18 System Application was developed using trade secrets misappropriated from Bartech Systems
19 International, Inc. **Therefore, further use of the ABreez software is prohibited without**
20 **further order of the court.**

21
22 The court ordered that this notice be sent to all customers using the ABreez software with
23 the Property Management System Application installed.
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BARTECH SYSTEMS INTERNATIONAL,
INC., a Delaware corporation,

Case No. 2:15-cv-02422-MMD-NJK

Plaintiff/Counter-defendant,

vs.

MOBILE SIMPLE SOLUTIONS, INC., a
Delaware corporation, MOBILE SIMPLE
SOLUTIONS (IAS), INC., a Canadian
corporation, VINCENT TESSIER, an
individual, CHRISTELLE PIGEAT, an
individual,

Defendants/Counterclaimants.

NOTICE OF INJUNCTION PROHIBITING USE OF ABREEZ SOFTWARE

You are hereby notified that the Pontchartrain Hotel (the "Hotel") cannot use the ABreez software until further notice. Therefore, please take whatever steps are necessary to disable the ABreez software on the Hotel's network system, including uninstalling the ABreez software if necessary. This directive is the result of a court order issued by the United States District Court for the District of Nevada. The court found that the ABreez Property Management System Application was developed using trade secrets misappropriated from Bartech Systems International, Inc. **Therefore, further use of the ABreez software is prohibited without further order of the court.**

The court ordered that this notice be sent to all customers using the ABreez software with the Property Management System Application installed.

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EXHIBIT B

EXHIBIT B

<u>Company</u>	<u>Hotel Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>Postal Code</u>	<u>Country</u>
AB "Valmeda"	Holiday Inn Vilnius	Simyniskiy str 1	Vilnius			Lithuania
			Los			
Sunset Tower Hotel	Sunset Tower Hotel	8358 Sunset Boulevard	Angeles	California	90069	United States
Beekman Hotel	Beekman Hotel	123 Nassau Street	New York	New York	10038	United States
5 Beekman Property Owner LLC	Beekman Hotel	38 Park Row	New York	New York	10038	United States
Royalton 44 Hotel Leasing L.L.C.	Royalton Hotel	545 E. John Carpenter Freeway Suite 1300	Irving	Texas	75062-8124	United States
80 Wythe LLC	Wythe Hotel	45 Main Street, Suite 602	Brooklyn	New York	11201	United States
1612 Wazee LLC	Nativ Hotel	1612 Wazee LLC	Denver	Colorado	80202	United States
Clift Holdings LLC	Clift Hotel	c/o Cara Ciuffani, 475 Tenth Avenue	New York	New York	10018	United States
Lighthouse Properties, LLC	The Raphael Hotel	P.O. Box 856	Salina	Kansas	67402-0856	United States
Peninsula Beverly Hills Hotel	Peninsula Beverly Hills Hotel	9882 South Santa Monica Boulevard	Beverly Hills	California	90212	United States
The Quin Hotel	The Quin Hotel	101 West 57th Street at 6th Avenue	New York	New York	10019	United States

Renaissance Paris Republique SAS S.H.P.R.	Renaissance Paris Republique	40, Rene Boulanger	Paris	75010	France
Wolverine Lessee LLC	Mondrian Hotel	c/o I.W. Winsten Honigman Miller Schwartz and Cohn LLP 660 Woodward Avenue	Detroit	Michigan	48226-3506 United States
Profitability Consulting PTY Limited	Alpine Gables Apartment Hotel	PO Box 1882	Wollongong	New South Wales	Australia
The Dorchester LTD	The Dorchester Hotel	53 Park Lane, Mayfair	London	W1K 1Q1	United Kingdom
TA Hotel Management LP	Trump Vancouver Hotel	1161 West Georgia Street	Vancouver	British Columbia	V6E 0C6 Canada
Pontchartrain Hotel	Pontchartrain Hotel	2031 St. Charles Avenue	New Orleans	Louisiana	70130 United States

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 28th day of March, 2017, I served a true and correct copy of the foregoing **[PROPOSED] ORDER** via courtesy email (listed below) and U.S. Mail, at Reno, Nevada, in a sealed envelope with first-class postage fully prepaid and addressed as follows:

Mobile Simple Solutions, Inc.
2711 Centerville Road, Suite 400
Wilmington, Delaware 19808

Mobile Simple Solutions (IAS), Inc.
3900-1, Place Ville Marie
Montreal, QC, H3B 4M7, Canada

Vincent Tessier
2298 Aria Drive
Henderson, Nevada 89052
Courtesy Email: vintessier@gmail.com; vincent@mobile-simple.com

Christelle Pigeat
1457 rue Laurier Est, #4
Montreal, QC, H2J 1H8, Canada
Courtesy Email: christelle@mobile-simple.com; christelle.pigeat@gmail.com

/s/ Kathy Souviron
Employee of Parsons Behle & Latimer